

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

TIMOTHY P. NEUMANN, ESQ. [TN6429]  
BROEGE, NEUMANN, FISCHER & SHAVER, L.L.C.  
25 Abe Voorhees Drive  
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*Attorneys for Debtor-in-Possession  
George Sarios*

In Re:

**GEORGE SARIOS**

Debtor.

Chapter 11

Case No.: 19-32528

Judge: Michael B. Kaplan

Recommended Local Form:

**X**

Followed

Modified

**CERTIFICATION OF PROFESSIONAL IN SUPPORT OF APPLICATION FOR  
RETENTION OF PROFESSIONAL**

I, Timothy P. Neumann, being of full age, certify as follows:

1. I am seeking authorization to be retained as:

☒ Attorney for: ☐ Trustee ☒ Debtor-in-Possession

☐ Official Committee of \_\_\_\_\_

☐ Accountant for: ☐ Trustee ☐ Debtor-in-possession

☐ Official Committee of \_\_\_\_\_

☐ Other Professional:

☐ Realtor ☐ Appraiser ☐ Special Counsel

☐ Auctioneer ☐ Other (specify): \_\_\_\_\_

2. My professional credentials include: I am an attorney at law of the State of New Jersey, having been admitted in 1973.

3. I am a member of the firm of: Broege, Neumann, Fischer & Shaver, LLC, 25 Abe Voorhees Drive, Manasquan, NJ 08736.

3. The proposed arrangement for compensation, including hourly rates, if applicable is as follows: subject to the approval of the Bankruptcy Court, based upon the following hourly rates for the following individuals who applicant anticipates will or may render services on its behalf: Timothy P. Neumann - \$600 per hour; Peter J. Broege \$595 - per hour; David E. Shaver - \$425 per hour Frank J. Fischer \$375 per hour; associates \$275 per hour; paralegals - \$100.00 per hour.

5. To the best of my knowledge, after reasonable and diligent investigation, my connection with the debtor, creditors, any party in interest, their respective attorneys and accountants, the United States Trustee, or any person employed in the Office of the United States Trustee, is as follows:

    ■     None  
         Describe connection: N/A

6. To the best of my knowledge, after reasonable and diligent investigation, the connection of my firm, its members, shareholders, partners, associates, officers and/or employees with the debtor, creditors, any other party in interest, their respective attorneys and accountants, the United States Trustee, or any person employed in the Office of the United States Trustee, is as follows:

         None BNFS has represented the Debtor in connection with a mortgage foreclosure proceeding entitled

\_\_\_\_\_ Describe connection To the best of my knowledge, my  
firm, its members, shareholders, partners, associates, officers and/or employees and I  
(check all that apply):

- ☒ Does not hold an adverse interest to the estate.
- ☒ Does not represent an adverse interest to the estate.
- ☒ Is a disinterested person under 11 U.S.C. § 101(14).  
Does not represent or hold any interest adverse to  
the debtor or the estate with respect to the matter for  
which she will be retained under 11 U.S.C. §  
327(e).
- \_\_\_\_\_ BNFS has not represented the Debtor in any prior filings.

BNFS has represented the Debtor in the following matters:

- A. Thomas Tsilivitis and TSS Holdings, LLC v. George Sarios; Docket No: MON-L-2700-16. Defense of Damages, non payment of mortgage etc
- B. Hudson Insurance Company vs Sarios et als Docket No. Mon-L-3080-16; Defense of complaint for indemnity to Hudson Insurance Company
- C. Aluma Systems Concert vs Sarios, et als Docket No. L-001709-16; Negotiate potential settlement
- D. Dreyers Lumber & Hardware Inc vs Sarios, et als Docket no. L-002536-15. Negotiate potential settlement
- E. Two River Community Bank vs Sarios, et als Docket No. L 002903-17. Defense guarantees of lines of credit to GCS Contractors, etc
- F. Joseph Fazio Wall LLC vs Sarios, et als Docket No. DC 003029-15. Negotiate potential settlement.
- G. Aaron & Com vs. Sarios, e als Docket No. DC-9578-16. Negotiate potential settlement.
- H. Woodhaven Lumber & Millwork vs Sarios, et als Docket No. DC-009067-15. Negotiate potential settlement
- I. Discover Bank vs Sarios, George Docket No. DC-003304-19. Negotiate potential settlement
- J. Gregory Sarios, Christopher Sarios, George Sarios and Sarios Enterprises, LLC vs Matthew Tucci Law Division, Monmouth County, Docket No. Mon-L-3242-19. Plaintiff SELLC was to be the manager of the properties, over see their sale and/or leasing, and be paid a monthly management fee the amount of which would be determined at a later date; With respect to properties that were sold, the sales proceeds would first be applied to repay Defendant for the construction and other costs paid by Defendant, and the balance would be divided evenly among Defendant and Plaintiffs Gregory Sarios, Christopher Sarios, and George Sarios.

7. If the professional is an auctioneer: N/A

A. A surety bond in accordance with D.N.J. LBR 2014-1(B)(2) is attached.

\_\_\_\_\_ Yes \_\_\_\_\_ No

B. My qualifications and previous experience as an auctioneer include:

C. Have you or any other member of your firm ever been convicted of any criminal offense, other than motor vehicle violations? If yes, explain:

8. If the professional is an auctioneer, appraiser or realtor, the location and description of the property is as follows: N/A

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: December 2, 2019

By: /s/ Timothy P. Neumann.  
Timothy P. Neumann, Esq